

# JONES DAY

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July 6, 2022

VIA ECF

The Honorable James L. Cott  
United States Magistrate Judge  
United States Courthouse  
500 Pearl St., Room 1360  
New York, NY 10007

Re: Adams v. Bloomberg L.P., No. 1:20-cv-07724-RA-JLC

Dear Magistrate Judge Cott:

We represent Defendant Bloomberg L.P. (“Defendant”) in the above-referenced matter, and write to respond to Your Honor’s July 1, 2022 Orders regarding the parties’ letter motions to seal certain exhibits attached to Plaintiff’s renewed motion for conditional certification and Defendant’s motion for summary judgement. Dkt. Nos. 113, 114. In the July 1, 2022 Orders, the Court ruled that “the Court will determine whether the redactions (and/or sealing) are appropriate” “[w]hen adjudicat[ing] the motion.” *Id.*

Bloomberg would like to confer with Plaintiff over what materials if any can be publicly filed, and then submit additional support for any documents which the parties agree need to remain under seal or be filed with redactions. Similarly, Plaintiff would like to confer with Bloomberg over what portions of the transcript of Sheena Adams’ deposition if any can be publicly filed, and then submit additional support for any documents which the parties agree need to remain under seal or be filed with redactions. In addition, the parties’ deadline for designating any portions of Dr. Paul White and Michael Russo’s depositions as confidential have not yet passed, and Defendant expects that once those designations have been made, additional portions of those depositions could be publicly filed. The parties therefore seek permission to present the Court with revised redaction and sealing requests by August 1, 2022 that would identify a final set of documents that need to remain under seal or need redactions and provide additional support for any such documents.

Plaintiff consents to this request. Should this request be met with Your Honor’s approval, a “So Ordered” line is provided below for the Court’s convenience.

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Respectfully submitted,

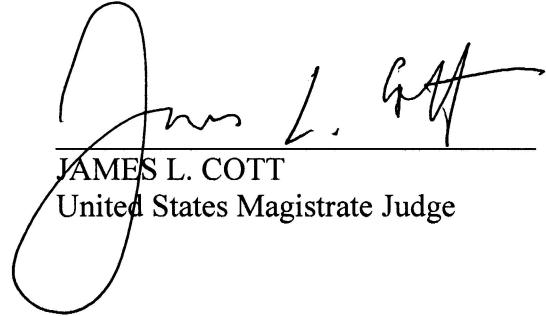
*/s/ Kristina A. Yost*

Kristina A. Yost

cc: Artemio Guerra  
Attorney for Plaintiff

**SO ORDERED.**

DATED: July 7, 2022  
New York, New York

  
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JAMES L. COTT  
United States Magistrate Judge